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January 13, 1987

MEMORANDUM

TO : Eng. Raquel G. Cortés  
Acting Director  
Land Pollution Control Area

THROUGH: Mrs. Ivette De Jesús, Chief  
Inspection, Monitoring and  
Surveillance Section

FROM : *Mur*  
María V. Rodríguez Muñoz  
Environmental Inspector

SUBJECT: TRAVENOL LAB. MARICAO  
PRD000706473

On October 8, 1986, Travenol Laboratories was visited. The purpose of the visit was to perform a RCRA Generator Inspection. Attached, please find the following documents in regard to this inspection:

- . Summary of Findings
- . Conclusions and Recommendations
- . RCRA Generator Inspection Form
- . C/E Log

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### SUMMARY OF FINDINGS

On October 8, 1986, Travenol Laboratories, was visited. During the visit a RCRA Generator Inspection was performed. The company is located at Route 357 Km. 8, Maricao, Puerto Rico. Its telephone number is 838-3000 and its identification number is PRD000706473.

Mrs. Mirta Sanabria, Manufacturing Maintenance Coordinator and Salvador Rivera, Environmental Coordinator of the company were interviewed and the following information was gathered:

Travenol Laboratories manufactures blood collection bags. The vinyl sheets are cut and sealed by heat, creating the bags. The product is finally sterilized and packaged. From this manufacture process they notified to EPA, the following wastes as generated:

- D000 - Toxicity
- D001 - Ignitability
- D002 - Corrosivity
- F003 - Containing cyclohexanone
- F005 - Methyl ethyl Ketone

These wastes are generated and stored in the facility for less than ninety (90) days.

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## GENERATOR STANDARDS

### Subpart A - General

#### 262.11/702 B (1) - Hazardous Waste Determination

Travenol Laboratories analyzed their wastes in order to determine if they meet the definition of hazardous waste. Their waste were hazardous and were listed in 40 CFR Parts 261.21 to 261.31.

#### 262.12/702 C (1) (2) - EPA Identification Numbers

Travenol notified in 1980 as a generator and TSD of hazardous waste. Now is classified as generator and its identification number is PRD 000706473.

### Subpart B - The Manifest

#### 262.20 - 262.23/703 - General Requirements and Use

The company used the manifest system correctly and send copy to EQB. Therefore the company is in compliance with this section.

### Subpart C - Pre-Transport Requirements

#### 262.30 - 262.33/704 (A) (B) (C) - Packaging, Labeling, Marking, Placarding

Mrs. Sanabria claims that the drums are properly packaged, labelled, marked and placarded according with DOT regulation, before transportation.

#### 262.34/704 (D) - Accumulation Time

The company is storing hazardous wastes on-site for less than 90 days. Records were reviewed and it was found in compliance with this section.

### Subpart D - Record Keeping and Reporting

#### 262.40/504 A (1) (2) - Recordkeeping

Travenol has copy of each manifest used for the transportation of hazardous waste. They maintain copy of the waste analysis tests performed to the hazardous waste.

#### 262.41/503 A - Annual Report

Travenol Lab. submitted to E.P.A. the Biennial/Annual Report with copy to EQB 1985 annual report. Company is in compliance with this section.

## 262.41/504 B - Exception Reporting

The company indicated that at this moment no Exception Report had been needed.

## Subpart I - Use and Management of Containers

### 265.171/812 C (1) (2) (4) - Condition of Containers

At the time of the inspection, three (3) drums of hazardous wastes were stored in the storage area. The drums were observed in good conditions.

### 265.172/812 C (4) - Compatibility of Waste with Containers

The containers used are made of materials compatible with the waste stored in them.

### 265.173/812 D (1) (2) - Management of Containers

At the time of the inspection, the drums were stored in such a way that ruptures or leaks are avoided.

### 265.174/812 E - Inspections

The company performs weekly inspections to the storage area in order to determine malfunction in it.

### 265.176/812 B (5) - Special Requirements for Ignitable or Reactive Waste

Ignitable containers are located at more than fifteen (15) meters from the facility's property line.

### 265.177/812 D (3) - Special Requirements for Incompatible Wastes

All the wastes are stored in containers made of compatible materials with them.

## PERSONNEL TRAINING

### 265.16/808 (B) (C) - Personnel Training

Travenol has a training program at the facility. They trained the personnel in hazardous waste management procedures. They selected persons which are able to respond effectively to emergencies. The rest of the personnel is trained for evacuation procedures. The last training was given on August 24, 1986. Therefore the company is in compliance with this section.



### Subpart C - Preparedness and Prevention

#### 265.31/810 B - Maintenance and Operation of Facility

The company maintains and operates the facility to minimize the possibility of fire, or any accident in which hazardous wastes are involved.

#### 265.32/810 C - Required Equipment

In case of emergency the company has an alarm system in order to warn all facility personnel that an emergency is taking place. Other equipment they have in case of an emergency is the following: fire extinguisher, spill control equipment, eye wash station, first aid kit, water hose. Therefore it was found in compliance with the requirements of this section.

#### 265.33/810 D - Testing and Maintenance of Equipment

The company tested and maintains the equipment in order to response in an emergency. This inspections are recorded in a log.

#### 265.34/810 E - Access to Communication or Alarm System

All the personnel involved in the Contingency Plan have immediate access to an internal alarm communication system.

#### 265.35/810 F - Required Aisle Space

Travenol has adequate aisle space to allow the unobstructed movement of personnel and fire protection equipment.

#### 265.37/810 G - Arrangements with local Authorities

They have evidence of updated arrangements made with the local authorities.

### Subpart D - Contingency Plan and Emergency Procedures

#### 265.52/207 - Content of Contingency Plan

The company has C.P. and SPCC Plan at the facility. This plan must be implemented immediately whenever there is a fire, explosion or release of hazardous waste which could threaten human health or the environment.

#### 265.53/207 (2) - Copies of Contingency Plan

The C.P. maintained at the facility and a copy was submitted to all the local authorities to be involved in an emergency situation.

Mrs. Mirta Sanabria  
Manufacturing Maintenance  
Coordinator  
Travenol Laboratories  
Box 832  
Maricao, Puerto Rico 00706

Dear Mrs. Sanabria:

Reference is made to the Full RCRA Generator inspection performed to your company on October 8, 1986 by Mrs. María V. Rodríguez, of the Land Pollution Control Area.

You are hereby informed that at the time of inspection, the company was found in compliance with the Regulation for the Control of Hazardous and Non - Hazardous Solid Wastes, amended version and the federal regulation 40 CFR 262.

This compliance letter is related only and exclusively with the above mentioned inspection.

We appreciate your cooperation in the preservation of the environment.

Cordially,

Raquel G. Cortés  
Acting Director  
Land Pollution Control  
Area

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